

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,
v.
Case No. 15-cr-132-jdp

RICHARD GEASLAND,

Defendant.

AFFIDAVIT OF RICHARD GEASLAND

STATE OF WISCONSIN)
)
) ss.
COUNTY OF DANE)

I, Richard Geasland, being first duly sworn, on oath hereby state the following:

1. My name is Richard Geasland, and I am 67 years-old. I am the defendant in this matter.

2. For approximately 15 years, I have received disability benefits from the Veterans Administration for a non-service-related injury. I was in a car accident in the late 1990s and I suffered a broken back. I had multiple surgeries. The surgeon put two plates and six screws in my ^{leg} ~~back~~ to repair it.

3. Until the last few years, I was prescribed, and took, opioids to treat chronic back pain. I wear hearing aids in each of my ears. I have lost about 80% of my hearing in my right ear and about 60% in my left.

RJG

4. I have been diagnosed with cirrhosis, osteoporosis, hypertension, and high cholesterol. I wear prescription eyeglasses for poor vision. I cannot read, write, or recognize faces without corrective lenses.

5. I have been seen by mental health professionals at the VA hospital in Madison since about 2000 for depression, anxiety, and insomnia. I have been prescribed, among other drugs, fluoxetine to treat the depression and alprazolam for anxiety.

6. For the past several years my memory has deteriorated. Sometimes I have difficulty recalling details quickly.

7. I was arrested in the evening on October 6, 2015, at my home in Cuba City, Wisconsin.

8. Officers tackled me to the floor and handcuffed me. I was told I was under arrest for child pornography.

9. Later, I was told that I would be taken to the Grant County Jail. At the jail, ~~I tried to run~~ I ~~ran~~ into a wall head first to harm myself. I was then taken by a Grant County Sheriff's Deputy to a facility that I later learned was in Winnebago, Wisconsin. I think I arrived at the facility in the early morning hours of October 7.

10. I was transported back to the Grant County Jail on October 8. I was on "suicide watch" in a cell by myself. I was inside the cell 24 hours per day. My ~~new~~ eyeglasses ~~were taken from me~~, and I could not see without them. I was given only
*had not arrived
in the mail*

a smock to wear. I was given a blanket. The cell contained a cot and Styrofoam mattress. The cell had a sink and toilet. There was a warped mirror. The cell had nothing else inside of it. I killed two cockroaches during my time in the cell.

11. During this time, the only human contact I had would be when deputies would periodically check up on me. Also, a nurse came in each day to examine me. The examination would take ten minutes or less.

12. I had panic attacks from time to time throughout my incarceration at the jail.

13. I asked the deputies for my son's telephone number or my landlord's telephone number, so that I could tell them where I had gone. No deputy ever provided me a telephone number for my son or landlord.

14. Throughout my time in the Grant County Jail, the deputies treated me with respect and dignity. One deputy in particular—a woman whose name I cannot recall—was especially kind to me.

15. I recall first asking a deputy if I could speak to an attorney on Monday, October 12. On Tuesday, October 13, a deputy asked me if I wanted to speak with an attorney. At first I declined, then I told the deputy I did want to speak with an attorney. The deputy told me an attorney would come see me that afternoon. No attorney visited me on October 13.

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16. On Thursday, October 15, a deputy told me that an attorney would visit me that afternoon. No attorney visited me on October 15. On Friday, October 16, a deputy told me that an attorney would visit me that afternoon. Later, a deputy told me that a state public defender could not visit me because my case was federal—not state. I became frustrated and threatened suicide. I was allowed to speak over the telephone with someone from the suicide hotline.

17. Sometime after Friday, a counselor from Unified Community Services came to visit me. I spoke with the counselor.

18. After Friday, I continued to ask to speak with an attorney each day.

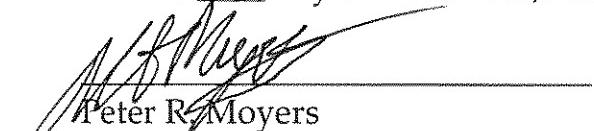
19. On Thursday, October 22, I was allowed to shower. Either that day or the next day, Friday, an attorney named Rose came to visit me at the jail.

20. On Monday, October 26, I had a hearing via video-conference in front of a judge while I remained at the jail. The judge said that he could not release me because there was a federal warrant for my arrest.

Richard J. Geasland
RICHARD GEASLAND

Subscribed and sworn to before
me this 31 day of December, 2015.

12/8


Peter R. Moyers
WI Bar No. 1096904
Attorney for Mr. Geasland